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September 26, 2023

Via ECF and E-Mail

Hon. Andrew L. Carter
United States District Judge
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square
New York, New York 10007

Re: *United States v. Barend Oberholzer*, 1:21-cr-00475-ALC

Dear Judge Carter:

I am writing on behalf of defendant Barend Oberholzer to seek a temporary modification to his bail conditions to allow him to travel to Denver, Colorado; Tullahoma, Tennessee; and Maui, Hawaii for business. Mr. Oberholzer would travel to Denver, Colorado leaving September 29, 2023 and returning the same day. Mr. Oberholzer would travel to Tullahoma, Tennessee three times: from October 4, 2023 to October 7, 2023; from October 9, 2023 to October 13, 2023; and from October 23, 2023 to October 27, 2023. Mr. Oberholzer would travel to Maui, Hawaii leaving October 18, 2023 and returning on October 21, 2023. If permitted to travel, Mr. Oberholzer will provide his Supervising Pretrial Officer with a complete itinerary. Pretrial Services, by PTSO Jackson, takes no position on Mr. Oberholzer's application. The government, by AUSA Capozzi, also takes no position on Mr. Oberholzer's application.

By way of background, on March 2, 2021, Judge Lehrburger released Mr. Oberholzer on a \$500,000 personal recognizance bond secured by two financially responsible persons, with conditions including, *inter alia*, that Mr. Oberholzer's travel be limited to the Southern and Eastern Districts of New York, and the Central and Southern Districts of California. Since that date, Mr. Oberholzer has remained compliant with the conditions of his release. With the Court's permission, Mr. Oberholzer has previously traveled for business and family vacation without incident.

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Hon. Andrew L. Carter
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We thank the Court for its consideration in this matter.

Respectfully submitted,

/s/ Ryan P. Poscablo
Ryan P. Poscablo, Esq.

cc: Jilan J. Kamal, Esq., Assistant United States Attorney (be ECF)
Domonique Jackson, Pretrial Services (by email)

So Ordered:



Hon. Andrew L. Carter, Jr. 9/28/23